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Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE CHICAGO BRIDGE & IRON
COMPANY N.V. SECURITIES
LITIGATION) CASE NO. 1:17-CV-1580
)
) Hon. Lorna Schofield

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION IN LIMINE NO. 15**

Defendants Chicago Bridge & Iron Co. N.V. (“CB&I”), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 15 to preclude any reference or comments mentioning, implying, or suggesting that there are any agreements among Defendants in this case relating to defense strategy or cost-sharing.

Such comments would be unfairly prejudicial to Defendants, would be irrelevant, and would confuse the issues and mislead the jury. FED. R. EVID. 402, 403.

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

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